

Gas Transmission Pipelines

Area Classification Wavier Proposal

Present Federal Regulations

- Class Location
 - Based Mainly on Number of Buildings Within a 660 ft Zone on Either Side of Pipeline
 - Class 1 Through 4
- Higher Class
 - Lower SMYS (i.e. MAOP)
 - Thicker pipe for Same Pressure
- Current Change in Class Location
 - 49CFR192.609 - Requires Study
 - 49CFR192.611 - Confirm or Revise MAOP

Current Change in Class Location Regulation

- Historically Within 18 Months
 - Evaluate Hoop Stress & Class Changes
 - Requires New Pressure Test Based on New Class, or
 - Reduce MAOP Commiserate with New Class
- Usually Results in
 - Capacity Reduction, or
 - Pipe Replacement
- Some Pipelines Built & Tested to Meet Expected Future Class Requirements

Proposed Class Waiver Process

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- Uses the Normal Case By Case OPS Waiver Approval Process
 - Burden of Proof on Operator
 - Subject to Public Notice & Comment
- Alternative Risk Control Activities
- OPS Can Retract Granted Waiver
- OPS Waiver Process Could Change With Experience

Proposed Criteria

- Class 4 Not Wavied
 - Only 1? 2, 1? 3, or 2? 3 Permitted
- No Bare Pipe or Wrinkle Bends
- No Class 3 Above 72% SMYS
- Hydrotested to At Least 1.25xMAOP
- In Line Inspection with No Major or Systematic Problems
 - Up to 25 miles On Each Side of Segment Must Be in IMP via Inline Inspection

Proposed Approach

- Three Categories Of Pipeline Segments
 - Probable Acceptance
 - Possible Acceptance
 - Requires Substantial Justification
- Each Category Has General Criteria Requirements

Overall Observations

- “Possible Acceptance” Looks “A Little Weak” or Too Broad
- Thicker or Lower SMYS Required in Present Class is Just a “Time to Failure” Issue
 - NTSB Observations on Cycling Failures (PAR-04/01)
- No Problem with Wavier if Confident That Segment is Good Pipe with Good Welds
- Big Problem if Process Goes Secretive to “Protect Us”
- Applies to Interstate and Intrastate Pipelines
- Specific Comments Need to Be Sent to OPS